



REPLY TO  
ATTENTION OF:

## UNCLASSIFIED

DEPARTMENT OF THE ARMY  
ARMY CONTRACTING COMMAND - ROCK ISLAND  
1 ROCK ISLAND ARSENAL  
ROCK ISLAND, IL 61299-8000

CCRC-AL

03 May 2013

General Dynamics  
Ordnance and Tactical Systems  
11399 16<sup>th</sup> Court N. Suite 200  
St. Petersburg, FL 33716

Subject: Disposition of material on W52P1J-05-C-0075 and W52P1J-11-C-0027

Ms. Seybold,

On 2 and 3 April, representatives from the Department of Defense Explosives Safety Board (DDESB), conducted a technical assistance visit (TAV) to Explo Systems in Minden, LA, at the request of the Louisiana State Police. During that visit, it was observed and reported that materials such as M6 propellant, Tritonal, hazardous waste (pink water) and explosives residue (i.e. tar mixed with TNT) from a previous TNT/Tritonal melt-out operation, Explosive D (ammonium picrate), and M30 propellant are all stored within operations line.

There is evidence that at least some of the above listed materials are a result of demil operations on contract W52P1J-05-C-0075, of which GDOTS used Explo Systems as a subcontractor. In accordance with page 17 of the above referenced contract, section 11.2: "The contractor shall ensure that any hazardous waste generated by the demilitarization process is disposed in an environmentally safe manner. The contractor shall submit documentation to the PCO to certify destruction of the waste. The documentation shall be in contractor format and include, as a minimum, a copy of the manifest and the name, location, the applicable federal/state identification of the company/organization responsible for disposal of the waste, the disposal date and a statement certifying disposal."

In addition, on page 18, section 15.2- 15.3, it states that:

15.2 All metallic components (excluding mutilated/inert scrap), explosives and propellant offered for resale shall be to licensed/permitted buyers, as applicable, and shall require End Use Certification as a condition of the sale.

15.3 End Use Certification shall consist of a signed statement from the purchaser as follows: "It is hereby certified that \_\_\_\_\_ will comply with all applicable federal, state, and local ordinances, and regulations with respect to the care, handling, storage and shipment, resale, export and other use of the material, hereby purchased, and that he/she as a user of, or dealer in, said materials is capable of complying with all applicable federal, state, and local laws." This certification is made in accordance with and subject to the penalties of Title 18, Section 1001, of the United States Code, Crimes and Criminal Procedures."

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It is further believed that the M30 propellant is a result of demil operations on contract W52P1J-11-C-0027 (DU round).

It appears that proper disposal of some of the residuals of the contracts between GDOTS and the U.S. Government (W52P1J-05-C-0075 and W52P1J-11-C-0027) has not occurred. As a result of this observation, please engage with Explo Systems, Inc. and the proper authorities, as appropriate (i.e. LASP, LANG, EPA), to ascertain which materials involved, if any, are a result of your subcontract with Explo Systems, Inc. and to develop a path forward for proper disposal. Points of contact listed below:

LT John Porter  
Louisiana State Police  
Emergency Services Unit  
805 Main Street  
Lake Charles, LA 70615  
337.515.9053  
[john.porter@dps.la.gov](mailto:john.porter@dps.la.gov)

Col Stuckey- Louisiana National Guard- 318-542-5624

Paige Delgado  
Federal On-Scene Coordinator  
Prevention and Response Branch (6SF-PO)  
U.S. EPA Region VI  
Office: 214.665.2724  
Cell: 469.371.2529  
[Delgado.paige@epa.gov](mailto:Delgado.paige@epa.gov)

Please provide a follow-up report to this office by close of business 10 May 2013. Points of contact for this letter are Christine Carson, 309-782-4301, [Christine.carson@us.army.mil](mailto:Christine.carson@us.army.mil), and Carrie Lansing, 309-782-7636, [carrie.b.lansing@us.army.mil](mailto:carrie.b.lansing@us.army.mil).

Sincerely,

*Christine Carson*

Christine Carson  
Procuring Contracting Officer

Digitally signed by  
CARSON,CHRISTINE.M.1231238890  
DN: c=US, o=U.S. Government,  
ou=DoD, ou=PKI, ou=USA,  
cn=CARSON,CHRISTINE.M.12312388  
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